1   Q.   And if I were to ask you the questions that are reflected

2   in that testimony today, would your answers today be the same?

3   A.   Yes.

4        MR. STEMM:  With that, your Honor, we would move

5   Ameritech Ohio Exhibit No. 1 into evidence and tender

6   Mr. Whiting for cross-examination.

7        EXAMINER JENNINGS:  Okay.

8        MR. CANIS:  No objection.  Thank you.

9        EXAMINER JENNINGS:  Has this been marked?

10       MR. STEMM:  Yes, your Honor.  We've just marked it as

11  Ameritech Ohio Exhibit No. 1.

12       EXAMINER JENNINGS:  Okay.

13       MR. STEMM:  And for the record, we'll follow with

14  Mr. Wardin's public version as Ameritech Ohio Exhibit No. 2, and

15  Mr. Wardin's confidential unredacted direct testimony as

16  Ameritech Ohio Exhibit No. 3.

17                              - - -

18                      CROSS-EXAMINATION

19  BY MR. CANIS:

20  Q.   All set, Mr. Whiting?

21       Throughout the Ameritech Ohio motion to deny petition and

22  also throughout your own testimony, and in particular on Page 5

23  of your testimony, there are references that Intermedia is an

24  interstate frame relay service provider.  Is that your position?

25  A.   I'd say more accurately an inter-exchange.  I'm not sure

1   exactly where I said "interstate."

2   Q.   Well, for instance, let me ask if you agree with this

3   statement on the Ameritech Ohio's motion to deny petition.  Do

4   you have a copy of that?

5   A.   No, I don't.

6        MR. STEMM:  We would ask that counsel provide a copy

7   of any document for the witness to refer to, please.

8        MR. CANIS:  I do not have an extra copy.  May I show

9   my page to the witness?

10        MR. STEMM:  That will be fine.

11        (Handed.)

12   BY MR. CANIS:

13   Q.   Mr. Whiting, the subheading of Chapter No. 3 states that

14   "The interconnection ICI seeks is for originating or terminating

15   its existing interLATA frame relay traffic, not for providing

16   telephone exchange service or exchange access..."  It goes on,

17   but I'll stop at that point.  Do you agree with that statement?

18   A.   I agree that's a possibility.  I didn't prepare this

19   specifically, but yeah, I agree it's a possibility.

20   Q.   May I take this back?

21   A.   Sure.

22   Q.   That's the last of the reference to that.

23        What do you -- What do you believe that that statement

24   means?

25   A.   Could I see the statement again that you're referring to?

1   Q.   Sorry.

2   A.   Sorry about that.

3   Q.   Of course.

4        (Handed.)

5   A.   Well, my interpretation of this statement, "The

6   interconnection ICI seeks is for originating or terminating its

7   existing interLATA from relay traffic...." and, again, I didn't

8   write this; so I'm not sure of the intent.  My interpretation,

9   from my perspective, is there's no real way to know or to police

10  such an activity.

11  Q.   Is there any technical reason why ICI is not capable of

12  providing local frame relay service?

13  A.   No.

14  Q.   Is there any reason -- Is there any regulatory reason why

15  ICI is not capable of providing local frame relay service?

16  A.   I'm not sure.

17  Q.   In your testimony on Page 5 you state that "Ameritech Ohio

18  is an intraLATA frame relay carrier"?

19  A.   Perhaps I have a different numbering, but what does the

20  question read in reference to my response?

21       MEMBER SOLIMAN:  Can you refer to the line number,

22  too, to make it easier?

23       MR. CANIS:  I certainly can.  Thank you.

24       THE WITNESS:  Oh, there's line numbers.

25  BY MR. CANIS:

1  Q.   Actually, I am looking at the verified statement of Timothy

2  Whiting on behalf of Ameritech Ohio that is attached to

3  Ameritech Ohio's motion to deny petition.

4  A.   Okay.  All I have in front of me is this (indicating).  I'm

5  not sure if the numbering is the same, but if you could give me

6  the question that my response is to, I could probably find it

7  pretty easy.

8  Q.   The statement there is "Ameritech Ohio is an example of an

9  intraLATA frame relay carrier."

10 A.   If you could read me the question that I answer, I might be

11 able to find it easier.

12 Q.   Basically it's in response to the question "What does the

13 router do?"

14 A.   Ahh, okay.  And your question is what?

15 Q.   Do you agree with that statement, that your position is

16 that Ameritech Ohio is an example of an intraLATA frame relay

17 carrier?

18 A.   Yes.

19 Q.   Can Intermedia similarly be an intraLATA frame relay

20 carrier?

21 A.   Technically, yes.  Again, from the regulatory perspective,

22 I'm not sure.

23 Q..   Back to Page -- that same page, that same section --

24 A.   Okay.

25 Q.   -- in response to the question "What does the router do?"

1   A.   Uh-huh.

2   Q.   The first line of that response is "The router examines the

3   address of data, compares it to prebuilt routing tables, and

4   determines where that data is to be sent."  Is that, in fact, a

5   characteristic of frame relay traffic?

6   A.   Yes, somewhat simplified.  The address is actually the data

7   link collection identifier, but it can be interpreted as an

8   identifier, yes.

9   Q.   Do other services use prebuilt routing tables?

10   A.   Yes.

11   Q.   What kind of services are those?

12   A.   Service I'm aware of is the asynchronous transfer mode.

13   I'm not personally aware of any others.

14   Q.   Do switched services ever use prebuilt routing tables?

15   A.   Such as?  For example?

16   Q.   Switched service.  Let's pick, I guess, any switched

17   service that you're aware of?

18   A.   Prebuilt routing tables, I would caution by calling a

19   routing table the same as an address table in a switched type

20   technology, but conceptually, yes.

21   Q.   So if we're switched voice telephony, I would use something

22   that if it's not exactly like a prebuilt routing table, it's

23   similar to a prebuilt routing table?

24   A.   In the portion of the technology that would establish a

25   connection on a switched technology such as a voice call, which

1  I think you're trying to draw a comparison to, at that point, it

2  would be similar.  The difference is in framed relay, a

3  connection is preestablished and premapped.

4  Q.   Well, tell me what a routing table does?

5  A.   A routing table in frame relay today defines the virtual

6  permanent connection.

7  Q.   Well, can you be a little more plain English than that?

8  A.   I'm not -- Sure.  It identifies the permanent path across

9  the frame relay network.

10  Q.   Basically does it identify where the call originates and

11  where the call terminates?

12  A.   Indirectly, yes.

13  Q.   But it provides direction for the transmission?

14  A.   It provides direction, but the actual address itself will

15  change from point to point along its transmission; so, yes, with

16  some additional comments.

17  Q.   All right.  How about the routing tables that switched

18  services uses, what kind of functions do they provide?

19  A.   Again, I'm not an expert, but from my understanding, I

20  believe they allow a -- you look at a routing table and it

21  allows you to establish a call on demand basically as opposed to

22  having the permanent connection.

23  Q.   But basically it tells you where a call originates and

24  terminates?

25  A.   Yes, and in contrast to frame, that doesn't change.

1   Q.   But similar to frame relay, the routing table tells the

2   call where it originates and where it terminates?

3   A.   I think you're trying to oversimplify.  Conceptually, they

4   are similar, but I don't agree with that.

5   Q.   Okay.  Do you have to have an entry into a prebuilt routing

6   table before a call can be completed?

7   A.   A call?

8   Q.   Let's say a transmission?

9   A.   A voice transmission or are we talking about frame relay?

10   Q.   Let's first talk about frame relay.

11   A.   Okay.

12   Q.   Do you have to have an entry before you can complete that

13   call?

14   A.   Yes.

15   Q.   So a routing table has an instruction as to where the call

16   goes.

17   A.   Yes, where the call goes next.

18   Q.   For a voice telephony service, can I make a call unless I

19   have an entry entered into that routing table?

20   A.   I don't believe so.  Again, I'm not an expert on the

21   technology of the voice network.

22   Q.   So until I have -- Well, let me ask it:  Do I have

23   ubiquitous access if everyone -- in an exchange if my number is

24   not built into the routing table?

25   A.   In what context?

1   Q.   In a voice telephony context.

2   A.   I don't believe so.

3   Q.   Or, for instance -- Well, are you familiar with

4   call-blocking technologies?

5   A.   No.  Specifically to voice technologies?

6   Q.   Yes, I'm sorry.  With voice?

7   A.   No.

8   Q.   Okay.  So you're not familiar with, let's say, 976 call

9   blocking or Caller ID blocking?

10   A.   I'm conceptually aware, not technically.

11   Q.   If I have a voice-grade telephony number that is blocked,

12   do people have ubiquitous access to my number?

13   A.   I assume by the word "blocked," no.  Again, I don't --

14   don't know.

15   Q.   At the very bottom of Page 5, and this is in response to

16   the question "Where does the data go after it reaches the

17   port?"

18   A.   Uh-huh.

19   Q.   I guess the third to the last sentence there states "The

20   NNI passes the data to an interLATA carrier's frame relay

21   network."  Is that always the case?

22          MR. STEMM:  Excuse me, we just note for the record

23   that we're still dealing with something other than his Exhibit

24   No. 1 in these questions; is that correct?

25          MR. CANIS:  That is correct.

1    MR. STEMM:  Are you going to be jumping back into the

2    exhibit soon, or are all your questions going to be based on

3    this other statement?

4         MR. VIREN:  It's the same thing.

5         (Pause.)

6         MR. CANIS:  Actually, I will not be jumping back and

7    forth.  I'll be staying in the verified statement.

8         MR. STEMM:  Could we just --

9         EXAMINER JENNINGS:  Let's go off the record for a

10   moment.

11        (Discussion held off the record.)

12        EXAMINER JENNINGS:  Okay.  Back on the record.

13        MR. CANIS:  Great, thank you.

14   BY MR. CANIS:

15   Q.   Okay.  So we are on Page 6 of Exhibit 1, Lines 19 and 20,

16   statement. "The NNI passes the data to an interLATA carrier's

17   frame relay network."  Is that always the case?

18   A.   The only exception to that case would be if the customer

19   were to do something on their own, accepting local traffic on

20   their own location and sending that off on their own to an

21   inter-exchange carrier, but in general, that's the case.

22   Q.   So it's your contention that NNIs are only used for the

23   transmission -- or for the vast majority of times used for the

24   transmission of interLATA traffic?

25   A.   Oh, no, I didn't mean to convey that.  It's basically

1   communication between two frame relay systems is the network

2   interface.

3   Q.   Does it matter where those interfaces are located or what

4   kind of traffic they transit?

5   A.   Besides engineering concerns from the traffic perspective,

6   no, it does not.

7   Q.   So if an NNI would be used to communicate between two

8   machines within a LATA, two frame relay switches within a LATA

9   that are providing local frame relay service, is that the case?

10  A.   That's one application.   They also could be used by two

11  switches in the same LATA that are carrying interLATA traffic.

12  Q.   Very good.   Do you know if Ameritech maintains more than

13  one frame relay switch in any LATA?

14  A.   Yes.

15  Q.   And the answer?

16  A.   Yes, they do.

17  Q.   Okay.

18  A.   Sorry.

19        MEMBER SOLIMAN:   For clarification, is that in Ohio

20  specifically or region-wide?

21        THE WITNESS:   Region-wide.   In certain LATAs Ameritech

22  will have multiple switches.   I believe there's at least one

23  LATA in Ohio that has multiple switches in a LATA; although, I'd

24  have to look back to make sure.

25        MEMBER SOLIMAN:   Okay.

1   BY MR. CANIS:

2   Q.   And does Ameritech provide an NNI that allows those two

3   switches that you just mentioned to talk to each other?

4   A.   Yes.

5   Q.   Is that a trunk connection as opposed to an NNI connection?

6   A.   Well, it is an NNI.   It also is a trunk, an internal trunk

7   that's utilized by Ameritech's internal switching company.

8   Q.   Could you elaborate on that, please?

9   A.   Sure.   Ameritech Advanced Data Services is a company that

10  provides switching services as a component of the tariff, and in

11  instances where there are multiple switches in a LATA, there

12  will be connectivity between those two Ameritech Advanced Data

13  Services, which is referred to as a trunk connection; it's also

14  an NNI.

15          MEMBER SOLIMAN:   Is that --

16          MR. CANIS:   I'm sorry.

17          MEMBER SOLIMAN:   I'm sorry to interrupt.   Just for

18  clarification, is that provided by AADS?

19          THE WITNESS:   AADS, yes.   Well, the actual facility is

20  purchased by AADS or A-A-D-S.   It's the first time I've ever

21  heard that called that.

22          MEMBER SOLIMAN:   I've been calling it that in Ohio.

23          THE WITNESS:   That is purchased from Ameritech, I

24  guess in this case Ameritech Ohio, per the proper special access

25  tariff or appropriate.

1          MEMBER SOLIMAN:   Thank you.

2    BY MR. CANIS:

3    Q.    What kind of a trunk is that, what capacity?

4    A.    It's an interswitch trunk.

5    Q.    Is that a T-1?

6    A.    Could be.

7    Q.    And you talk about it being a trunk and an NNI.   Is there a

8    difference?   Is there a point of demarcation as to where the

9    trunk ends and an NNI begins?

10   A.    A trunk, I refer to it's the physical facility, and the NNI

11   is the actual standards-based protocol that goes across that

12   trunk to all the switches that talk to each other.

13   Q.    So if I was -- If I tried to hold this thing, you know, as

14   a physical piece of equipment, can I pull off the NNI and pull

15   off the trunk and hold two different pieces of equipment?

16   A.    Well, it's sort of different levels of communications.   The

17   trunk gives you the physical capacity, and then the NNI is more

18   the logical communications across that trunk.

19   Q.    Okay.   Is it safe to say then that the two functions are

20   identical in that facility or inextricably intertwined?

21   A.    Which two functions?   I'm not clear on --

22   Q.    The NNI protocol and the transport.

23   A.    I'm not sure I understand what you're asking me.

24          MEMBER SOLIMAN:   Can we ask the witness if he can draw

25   on the board what exactly -- what part of the frame relay

1  network we are talking about now?  And it's been a general

2  procedure that we can transcribe this and have it as an exhibit.

3          THE WITNESS:  You're going to make me famous.

4          MEMBER SOLIMAN:  It's going to be an Ameritech Ohio

5  exhibit.

6          THE WITNESS:  What would you like me to draw for you?

7  And let me forewarn you, my drawing skills are not the best, but

8  I'll do my best.

9          MEMBER SOLIMAN:  That's fine.  Actually, the scenario

10  that has been described that a trunk would work as a function --

11  not as a function, but you can call it NNI function,

12  function-wise.

13          THE WITNESS:  Okay.

14          MEMBER SOLIMAN:  I was trying to follow the scenarios

15  that have been described by ICI how you -- you, Ameritech Ohio

16  and AADS have, together, put Ameritech's frame relay network.

17          THE WITNESS:  So you'd like an overview of the frame

18  relay offering in general?

19          MEMBER SOLIMAN:  Yes.

20          THE WITNESS:  Like a diagram of what we're talking

21  about?

22          MEMBER SOLIMAN:  Yes.

23          THE WITNESS:  Okay.  Well, Ameritech Advanced Data

24  Services exists as a subsidiary of Ameritech to provide data

25  services, and as of June 1996, we changed the structure of

1   Ameritech frame relay because we were mandated by the FCC tariff

2   to restructure it.  So this is as of June 1996.  Basically, you

3   have an Ameritech Advanced Data Services switch site, which is

4   separate from Ameritech.  It's their own leased space off behind

5   a white hen or wherever they have it, and here they have the

6   actual frame relay switch.

7         Now, this frame relay switch is connected to an

8   Ameritech Ohio, in this case, serving wire center via access

9   facilities.  So you have access facilities that could be --

10  they're usually optical facilities.  They could be DS-3 private

11  line facilities, but they run between the AADS frame relay

12  switch and the serving wire center of Ameritech Ohio.

13        Now what we're talking about, I guess, here when we're

14  talking about connecting two switches in a LATA, is that the

15  direction you want me to go?

16        MEMBER SOLIMAN:  Uh-huh, unless that's what -- I'm

17  mistaking that's the direction ICI is going.

18        MR. CANIS:  Absolutely, yes.

19        THE WITNESS:  There's another AADS switch site with a

20  frame relay switch, and that similarly has access facilities

21  into a serving wire center of Ameritech Ohio.  And when we talk

22  about trunks for communication between these switches, it's

23  really -- this is one component of the frame relay offering,

24  this is the switching component, this is bundled together with

25  facilities or combined with facilities to provide an offering to

1  our inter-exchange, such as ICI or as a business like State of

2  Ohio.

3          There are cases where you have multiple switches in

4  Ohio where you have facilities purchased between these two, and

5  that's what we're talking about as a physical trunk.  And the

6  NNI is the logical connection that enables these two switches --

7  these two switches to talk to each other.  Should I label this

8  some more for purposes of transcription or anything?

9          MEMBER SOLIMAN:  If you can, label the dotted line --

10          THE WITNESS:  Okay.

11          MEMBER SOLIMAN:  -- as the logical.

12          THE WITNESS:  The NNI protocol and then this

13  non-dotted one would be the physical trunk.  Again, let me

14  reiterate this together is a component of Ameritech frame relay;

15  so what we will then do is put together other pieces such as

16  facilities to an Intermedia Communications or facilities to an

17  end customer and that's our frame relay offering.

18          MEMBER SOLIMAN:  Thank you.

19          THE WITNESS:  Sure.

20  BY MR. CANIS:

21  Q.    Let's stay on that diagram, Mr. Whiting.  What is the

22  connection between AADS and the serving wire center shown on the

23  top?

24  A.    This connection here (indicating)?

25  Q.    Uh-huh.

1   A.   As I stated before, this is a physical facility, whether

2   it's an optical facility or a private line facility.

3   Q.   Is it an NNI?

4   A.   No.

5   Q.   So it's just a transport element?

6   A.   That's correct.

7   Q.   Where -- Is there an NNI on that diagram?

8   A.   Yes, where it says "NNI," between the two switches or

9   between the AADS switch and an ICI frame relay switch.  Or if an

10  end customer would have their own end relay switch, that would

11  be the logical connection between the two.

12  Q.   I thought end user customers used UNIs?

13  A.   Not always.

14  Q.   But isn't it a convention in the industry that NNIs are

15  carrier-to-carrier connections?

16  A.   An NNI is a connection between two frame relay switches.  I

17  would say most of them are between carriers, but there's

18  certainly nothing to preclude an end user to run their own relay

19  switch and run a network-to-network interface relay.

20  Q.   I guess my question is:  Are UNIs and NNIs

21  inter-exchangeable?

22  A.   No.

23  Q.   What's the difference?

24  A.   The difference is in the standard.  And again, the general

25  comment you made is somewhat true, the UNI is usually between a

1   device such as a router and the frame relay switch.   An NNI

2   would be between two frame relay switches.

3   Q.   Do carriers tend to seek connections between routers in a

4   frame relay switch?

5   A.   By "carriers," what do you mean?

6   Q.   Oh, let's say MFS is seeking to interconnect its UNI

7   circuits to Bell Atlantic.

8   A.   To Bell Atlantic?   MFS doing what?

9   Q.   Pick your BOC.

10   A.   And they're trying to do what?

11   Q.   They have, oh, I don't know, let's say UNI traffic, just

12   frame relay traffic that they want to cross-connect to another

13   ILEC?

14   A.   I would say in most cases that would be the

15   network-to-network interface.

16   Q.   And is it your understanding that what Intermedia is

17   looking for is an NNI as opposed to a UNI?

18   A.   Specific to our conversation here?

19   Q.   Yeah, as your understanding what Intermedia is looking for

20   at this proceeding?

21   A.   Okay.   Yes.

22   Q.   Okay.   Now, the NNI that you show on your diagram there, is

23   that for the transport of interstate or local service?

24   A.   This one here?

25   Q.   Uh-huh.

1  A.   Well, again, it gets down to the issue to how you identify

2  that traffic over that connection.  I don't think there's a way

3  to say, one way or the other, whether it's interstate,

4  intrastate or interLATA.

5  Q.   Or a mix?

6  A.   Or a mix.

7  Q.   Is it your understanding that's common practice in the

8  industry to mix the different types of service?

9  A.   I don't know.

10  Q.   But is it -- Do you know whether it's technically feasible

11  to do so?

12  A.   Yes, it is technically feasible.

13        MEMBER SOLIMAN:  Excuse me, can I have a

14  clarification.  What do you mean by "mix" different type of

15  services?

16        MR. CANIS:  I'm sorry, general meaning, inter- versus

17  intrastate service.

18        MEMBER SOLIMAN:  Okay.

19  BY MR. CANIS:

20  Q.   In this particular diagram that you drew showing the

21  connection between AADS and Ameritech, what is the nature of the

22  traffic going across that NNI?

23  A.   It could be a mix.

24  Q.   Okay.  What exactly is AADS?

25  A.   In what terms?

1   Q.   Is it a telecommunications company, is it a reseller, a

2   facilities-based carrier --

3   A.   The first two.

4   Q.   -- an insurance provider?

5   A.   I can agree with the first two.  It is a subsidiary of

6   Ameritech, a legal entity which was separated from Ameritech to

7   have some more flexibility when offering data services similar

8   to some of the other carriers such as U.S. West and Bell

9   Atlantic that have separate subsidiaries.

10       It is -- I forgot the second one you said.  It's not

11  facility based because that -- as the FCC has dictated, we do

12  not own our own facilities; we resell.  So we are a reseller.  I

13  guess that was the third one.

14  Q.   Okay.  Is it a regulated entity?

15  A.   Not directly.

16  Q.   So it is not certified?

17  A.   In what -- As a local exchange carrier?

18  Q.   Yeah.

19  A.   No.

20  Q.   Okay.  Is it certified as an inter-exchange carrier?

21  A.   No, not at this time.

22  Q.   A CLEC?

23  A.   Not at this time, no.

24  Q.   Do you know if it holds a certificate of public convenience

25  and necessity from the Ohio PUC?

1  A.   I'm not sure what that is; so, no, I'm not aware one way or

2  the other.

3  Q.   Is it subject to rate regulation?

4  A.   In the sense that AADS is a reseller, it must only buy the

5  tariff, yes, it is for frame relay services.  In the sense that

6  AAD is a provider of frame relay switch services, no, to my

7  knowledge it does not.

8  Q.   Does it provide its own services through a tariff?

9  A.   I'm not sure what you're asking.

10  Q.   I am a customer of AADS.  I call AADS up and I order

11  service.  How is it priced?

12  A.   Priced per -- Well, I assume you're talking about frame

13  relay service, that component of it, because AADS adds a lot of

14  other value to that to enhance it such as customer premise,

15  et cetera; so the actual frame relay service is from the

16  appropriate access tariff.

17  Q.   Can I get just plain frame relay service from AADS without

18  any other bells and whistles?

19  A.   No.  That would be purchased through another sales channel

20  of Ameritech such as Custom Business Services.  When there's not

21  any extras bells and whistles, as you put it, added to frame

22  relay, that can be sold directly through our business unit

23  similar to a Centrex service, something like that.

24  Q.   So if I'm buying frame relay service from -- If I'm buying

25  frame relay service, I would buy that from Ameritech through

1  tariff?

2  A.    Yes.   In fact, that's how ICI purchases frame relay for the

3  inter-exchange NNI connection, they work through the Ameritech

4  long distance industry's business unit.

5  Q.    Now, Ameritech purchases its frame relay switching

6  functionality from AADS, is that the case?

7  A.    Yes, that's correct.

8  Q.    And Ameritech, effectively, resells the AADS switching

9  functionality to provide its frame relay service?

10  A.    Not directly, but it is part of a larger offering, yes.

11  Q.    Could you explain that, please?

12  A.    Well, together with the frame relay switching capability

13  you talk about, you know, for instance, we're talking about the

14  NNI connection that ICI might purchase or currently does as an

15  inter-exchange carrier, together with the frame relay switch

16  there's also this facility that's bundled in.  AADS purchases

17  this facility and then basically will sell that capacity as part

18  of the greater frame relay offering.

19  Q.    So it's not stated as a separately tariffed item or

20  anything like that --

21  A.    The --

22  Q.    -- AADS functionality?

23  A.    Not the switching functionality, no.

24  Q.    Okay.  So when Ameritech resells AADS switching

25  functionality, it provides that bundled into its normal frame

1   relay service?

2   A.   I'm not sure -- "normal" is an interesting word, but yes,

3   as part of the basic frame relay it is bundled together.

4   Q.   If I buy frame relay service from Ameritech, on my bill I

5   get one price for frame relay or are those different elements?

6   I'm going to get a separate statement saying this is X amount of

7   dollars, and it lists switching functionality purchased from

8   AADS?

9   A.   You do get a -- There will be a line item for the frame

10  relay switching component.  There also will be a line item for

11  the physical facility that needs to be purchased separately to

12  get, for instance, from a customer premises or from a carrier to

13  this point, where it's handed off to Ameritech.

14  Q.   What does this bill look like?  Is this an Ameritech bill?

15  A.   Honestly, I've never seen one.  I would -- I know it's an

16  Ameritech bill.

17  Q.   Is AADS identified on that bill?

18  A.   It depends.  If AADS resells the service, it's usually an

19  AADS bill.  In Ohio, that would outline the basic frame relay

20  component, and then any additional value for or bought directly

21  from a business unit such as the Long Distance Industries, that

22  would be directly from that or whatever billing agency that

23  business unit uses.

24  Q.   Does AADS hold all of Ameritech's frame relay switches used

25  for the provision of local frame relay service?

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1  A.   When you say "hold," do they own them; is that what you --

2  Q.   (Nods head.)

3  A.   To my knowledge, yes.

4  Q.   Now, you mentioned a little bit earlier that there's one

5  LATA where Ameritech has two frame relay switches.  Are they

6  used to provide local service?

7  A.   They can be, sure.

8  Q.   Right.  So your statement that AADS holds all of

9  Ameritech's frame relay switches used in the provision of local

10  service, do you need to amend that statement?

11  A.   You lost me a little, what did you --

12  Q.   I thought --

13  A.   I apologize.

14  Q.   I thought earlier you said Ameritech owns -- in one LATA in

15  Ohio it has two frame relay switches and runs an NNI between

16  them?

17  A.   Okay.

18  Q.   And my question to you is:  Are those frame relay switches

19  that are held by Ameritech, that are owned by Ameritech, used to

20  provide local frame relay service?

21  A.   They're owned by Ameritech Advanced Data Services as a

22  subsidiary, not by Ameritech, and yes, they can be used for

23  local frame relay services.

24  Q.   All right.  Well, I think it's important that we get our

25  terminology straight.  When I say an AADS switch, I mean a

1   switch that's owned by AADS; and when I say an Ameritech switch,

2   I mean a switch that's owned by Ameritech.

3   A.   Okay.

4   Q.   Now, in the example that you talked about before where we

5   have a LATA where there are two frame relay switches and an NNI

6   going between them in Ohio, are those switches owned by AADS or

7   by Ameritech?

8   A.   By AADS.

9   Q.   Now, Ameritech owns its own frame relay switches, does it

10  not?

11  A.   No.

12  Q.   How about frame relay switches used in the provision of

13  interLATA frame relay?

14  A.   No, we would -- we basically allow interconnection with

15  inter-exchange carriers such as ICI to communicate across LATA

16  boundaries.

17  Q.   How about in the provision of interstate frame relay

18  service?

19  A.   Same, same holds.

20  Q.   Well, Ameritech has a tariffed interstate frame relay

21  offering?

22  A.   Uh-huh.

23  Q.   Does it own any of the frame relay switches used in the

24  provisioning of that service?

25  A.   No.

1  Q.   All of those switches are owned by AADS as well?

2  A.   That's correct.

3  Q.   Okay.  So all switches used for -- in local intraLATA,

4  interLATA and interstate frame relay are held by AADS, they're

5  owned by AADS?

6  A.   Well, when you say provide interstate and interLATA,

7  Ameritech -- AADS nor Ameritech provides that.  We do provide

8  connection to carriers that can get us across the boundaries in

9  a couple of different ways.

10  Q.   All right.  Well, when I buy a frame relay out of

11  Ameritech's FCC tariff, that's an interstate service?

12  A.   Uh-huh.

13  Q.   Okay.

14  A.   Or interLATA.

15  Q.   Or interLATA, right.

16       Now, who owns the frame relay switches that are used to

17  provision that service to me?

18  A.   I feel like I'm repeating the same answer.  AADS owns the

19  switches.

20  Q.   I just want to get this clear.

21            MR. STEMM:  I think we're all clear now.

22  BY MR. CANIS:

23  Q.   Could you answer that one more time, please?

24  A.   AADS.

25  Q.   Ameritech recently filed some rates for NNIs.  In this kind